

Voluntary Remediation Work Plan

Former Lodge Brothers and Former Bullet Pawn Shop Properties

Caldwell, Idaho



Former Lodge Brothers Property

919 Blaine Street

Former Bullet Pawn Shop Property

911 Blaine Street

Submitted to:



Prepared for:

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1.0 INTRODUCTION

Millennium Science and Engineering, Inc. (MSE) prepared this Voluntary Remediation Work Plan (VRWP) for the Idaho Department of Environmental Quality, on behalf of DL Evans Bank, to address contamination associated with two properties located at 911 and 919 Blaine Street in Caldwell, Idaho. The current owner of the properties, DL Evans Bank, agreed to participate in Idaho's Voluntary Cleanup Program (VCP). DL Evans Bank plans to remediate soil and groundwater petroleum impacts and abate asbestos and lead-based paint in building materials as part of redevelopment of the properties. DL Evans Bank purchased the two adjacent properties in 2007 for redevelopment and construction of a new facility. Redevelopment of the two properties is intended for commercial use by DL Evans Bank and is compatible with the use(s) of surrounding properties. Prior to redevelopment of the properties, the existing buildings (one located on each property) need to be demolished, removed and environmental cleanup activities performed before new construction can be initiated.

The VRWP discusses the findings and results of Phase I Environmental Site Assessments (ESAs) of the two properties (May 2007), Phase II ESAs of the two properties (July 2007) and Asbestos and Lead-Based Paint Material Surveys of each building occupying the respective property (May and June 2008). Copies of these reports are available on request from Mr. Eric Traynor of the Idaho Department of Environmental Quality (IDEQ) regional office located in Boise, Idaho.

The public will be given a period of 30-days to comment on the VRWP. IDEQ will announce the comment period by publishing a notice on their public comment opportunity website and in the local Idaho newspaper. Submittal of this VRMP addresses the requirements of the VCP according to IDAPA 58.01.18 "Idaho Land Remediation Rules".

1.1 Legal and Property Descriptions, Land Use and Topography

The USGS, 1971, Caldwell, Idaho 7.5 minute quadrangle map shows the properties located in the southwest quarter, of the southeast quarter, of the southwest quarter of Section 22, Township 4 North, Range 3 West, Boise Meridian, Canyon County, Idaho (Figure 1).

911 Blaine Street – Former Bullet Pawn Shop

The property located at 911 Blaine Street is an approximate 4,800-square foot parcel of land and is currently occupied by one structure (approximately 3,000 square feet in size) and was formerly operated as the Bullet Pawn Shop (Figure 2). A paved alley and Blaine Street bounds this property to the northeast and southwest, respectively. Land addressed as 919 Blaine Street and 903 Blaine Street bound this property to the southeast and northwest, respectively. The property assessor's parcel number is R046240000 and is located on Lot 19 of Block 9 in the subdivision of Caldwell Original.

919 Blaine Street – Former Lodge Brothers Property

The property located at 919 Blaine Street is an approximate 0.41-acre parcel of land and is currently occupied by one structure (approximately 6,000 square feet in size) and was formerly operated as the Lodge Brother's Automotive Dealership (Figure 3). A paved alley, South 10th Avenue and Blaine Street bounds this property to the northeast, southeast and southwest, respectively. The former Bullet Pawn Shop (911 Blaine Street) bounds this property to the northwest. The property assessor's parcel number is R046230000 and is located on Lots 13 through 18 of Block 9 in the subdivision of Caldwell Original.

Indian Creek is located approximately 40-feet north of the property boundaries. The elevation of the properties is approximately 2,370 feet above mean sea level, and topography slopes gently toward the northwest.

1.2 Property History

911 Blaine Street – Former Bullet Pawn Shop

In approximately 1975, the property was developed as a pawnshop (Jacks Pawn) until 1979, when the property was purchased by Tim and Elaine St. George in 1980 and continued to be operated as a pawnshop until approximately 1991. Between approximately 1992 and 1996 the property was vacant. In approximately 1997, Mr. Gary Crew purchased the property and operated the Bullet Pawn Shop to the present. Mr. Crew indicated a UST is currently located near the northeast side of the building and was historically used for heating oil.

919 Blaine Street – Former Lodge Brothers Property

In approximately 1950, Mr. Bill Lodge purchased 919 Blaine Street and developed the property as an automotive dealership. In approximately 1977, the dealership was discontinued and Sears Roebuck & Company moved into the structure. In approximately 2002, Barber's Dairy Supply occupied the structure until approximately 2005. The property has been unoccupied to the present time. Mr. Lodge indicated several USTs historically containing gasoline were removed from the property in the early 1990's.

2.0 PREVIOUS ASSESSMENTS AND SURVEYS

The following summarizes previous Phase I and II ESAs and asbestos and lead paint surveys conducted at 911 and 919 Blaine Street.

2.1 Phase I Environmental Site Assessments

Phase I ESAs were conducted on the two properties in May 2007. The following summarizes the recognized environmental conditions (RECs) presented in the two Phase I ESA reports (authored by MSE):

911 Blaine Street – Former Bullet Pawn Shop Property

- MSE considers the existing heating oil underground storage tank (UST) a REC, due to the unknown condition and history associated with the UST.

919 Blaine Street – Former Lodge Brothers Property

- Information on file at IDEQ indicated USTs were formerly located on the adjacent former Lodge Brothers property. File information indicates the USTs were removed in 1991 and soil samples were reportedly collected and analyzed for TPH according to EPA Method 8015. Soil sample analytical results indicated petroleum contamination existed in the UST basin. Contaminated soil was excavated, however soil removed from the UST basin is undocumented and no confirmation samples were collected. In addition, laboratory analysis did not include aromatic hydrocarbons such as benzene, toluene, ethylbenzene, total xylenes, naphthalene or solvents. Based on this information, the UST basin is considered a REC.
- Three hydraulic actuated vehicle lift stations were observed inside the building. Each hydraulic lift includes a hydraulic fluid reservoir tank to facilitate host lift. This assembly is contained inside concrete block vaults, which are located beneath the concrete floor. Based on the potential for hydraulic fluid to be released to the subsurface, these lift assemblies are identified as RECs. What appeared to be used motor oil was noted in the concrete block vaults and may have seeped through the grout joints between the concrete blocks and into subsurface soil.
- Two separate drains were observed in the concrete floor located inside the structure. One linear floor drain is located in the former automotive maintenance/repair area (near the vehicle hoists) and the other was located in what appeared to be the automotive wash area. Both floor drains appear to be connected to an oil/water separator sump. Historically, solvents and other petroleum products may have been washed into the floor drains and leaked into the subsurface; therefore these features are identified as RECs.

2.2 Phase II Environmental Site Assessments

Phase II limited subsurface assessment activities were performed in response to reported RECs, identified in the Phase I ESA reports. Phase II scope of activities involved collecting subsurface soil and groundwater samples at seven direct-push probe locations to assess for the presence of petroleum hydrocarbons. The direct-push probe locations are illustrated on Figure 4. The following summarizes the results of the Phase II ESAs:

Soil Sample Results

Soil samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and TPH according to EPA Methods 8260B, 8270 and 8015, respectively. Concentrations of VOCs and SVOCs were present in soil samples collected from probe locations P5 and P6 (919 Blaine Street), however concentrations were reported below the Idaho Risk Evaluation Manual (REM) Initial Default Target Levels (IDTLs).

Concentrations of TPH were reported in the soil sample collected from probe location P5 at 79,800 micrograms per kilogram (ug/kg) diesel range hydrocarbons (DR) and 3,580,000 ug/kg lube oil range hydrocarbons (LOR). A TPH concentration of 3,180,000 ug/kg LOR was reported in the soil sample collected from probe location P6. TPH concentrations are not used for REM comparison screening values, however they do provide quantitative information regarding the presence of heavier, less volatile petroleum constituents. Soil sample analytical results are provided on Tables 1 and 2.

Groundwater Sample Results

Groundwater samples were analyzed for VOCs and SVOCs according to 8260B and 8270, respectively. Phenanthrene (SVOC) was present in the groundwater sample collected from probe location P1, located near the existing heating oil UST (911 Blaine Street), however the concentration was reported below the Idaho REM IDTL. Benzene, total xylenes and naphthalene (VOCs) were present in the groundwater sample collected from probe location P4 located near the former UST basin. Benzene was reported at 61 ug/l, exceeding the Idaho REM IDTL, however total xylenes and naphthalene were reported below the Idaho REM IDTLs. Total xylenes and naphthalene were present in the groundwater sample collected from probe location P5 located near the hydraulic lift stations, however concentrations were reported below the Idaho REM IDTLs. Groundwater sample analytical results are provided on Table 3.

2.3 Asbestos Surveys

Asbestos surveys were conducted at each property for materials potentially containing asbestos inside/outside each building. Seven samples were collected at 911 Blaine Street and twenty-two samples were collected from 919 Blaine Street and were laboratory analyzed using polarized light microscopy (PLM) methods. The bulk samples were collected (and analyzed) for each homogeneous material suspected of containing asbestos to confirm percent (%) and type of asbestos. PLM analysis can identify the presence of asbestos in a sample at quantities greater than 1%. The following summarizes the survey results:

911 Blaine Street – Former Bullet Pawn Shop Property

Based on laboratory analysis of the bulk samples collected, asbestos is present at the following three locations in the former Bullet Pawn Shop building:

- Thermal System Insulation (TSI) and HVAC duct tape located in the attic crawl space at 50% chrysotile.
- Silver paint on black-layered bituminous roofing material at 5% (chrysotile at <1%).
- Grey and/or black tar/mastic (chrysotile at 7%).

Asbestos containing materials (ACMs) encountered in the survey were reportedly non-friable and in fair to good condition.

919 Blaine Street – Former Lodge Brothers Property

Based on laboratory analysis of the bulk samples collected, asbestos is present at the following ten locations in the former Lodge Brothers building:

- 12"x12" vinyl floor tile mastic (black and brown) located in upper tier of main lobby at 5% (<1% chrysotile).
- 9"x9" vinyl floor tile (both layers) and mastic located upstairs at 3% (chrysotile at 3%).
- 9"x9" vinyl floor tile and mastic located upstairs in northeast bathroom at 3% and >1%, respectively (chrysotile at 3%).
- Black vinyl floor tile and white tile mastic located upstairs in southeast bathroom at 3% and 5%, respectively (chrysotile at >1%).
- TSI Mudded Elbow located in upstairs storage area (ACM at >1% chrysotile and 4% amosite).
- TSI runs located in upstairs storage area (ACM at 45% chrysotile).
- Boiler Jacket located in boiler room (ACM at >1% chrysotile and 4% amosite).
- Two layers of roofing material and mastic at 50% each and >1%, respectively (chrysotile at 10%).
- Four layers of roofing material and mastic at 25% and >1%, respectively (chrysotile at 10%).
- Roofing mastic at 20% (chrysotile at >1%).

The ACMs encountered in the survey were reportedly non-friable and in fair to good condition.

2.4 Lead-Based Paint Surveys

The purpose of the lead based paint survey was to identify if paint on the interior and exterior surfaces of the building contain hazardous levels of lead.

The U.S. Department of Housing and Urban Development (HUD) has developed Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. Lead is considered a potential hazard if above the following levels, however can be hazardous at lower levels, if improperly handled:

- 5,000 milligrams per kilogram (mg/kg) or
- 0.5% lead by weight or
- 1.0 milligram of lead per square centimeter (1 mg/cm²).

Survey samples were submitted for laboratory analysis according to EPA Method 6010B and results were reported in mg/kg.

911 Blaine Street – Former Bullet Pawn Shop Property

Three differential paint samples were collected during the survey. Based on laboratory analytical results, lead was detected in the three paint samples and concentrations were reported below 5,000 mg/kg.

919 Blaine Street – Former Lodge Brothers Property

Fourteen differential paint samples were collected during the survey. Based on laboratory analytical results, lead was detected in the fourteen paint samples and concentrations were reported below 5,000 mg/kg, except for three locations where lead was reported at 11,000 mg/kg (two locations) and 26,000 mg/kg.

3.0 CONTAMINATE DISTRIBUTION

The subsurface contamination is generally of a petroleum nature and appears to have been released to the soil and groundwater through former and possibly current leaking USTs, associated piping and poor facility management practices. Asbestos containing material is present in both buildings (911 and 919 Blaine Street) and lead-based paint is present in the building located at 919 Blaine Street.

3.1 Chemicals in Soil

Concentrations of VOCs and SVOCs in subsurface soil were reported below the Idaho REM IDTLs, however this source soil material appears to be providing a contaminant pathway to groundwater in the former UST basin. TPHs were reported near the hydraulic vehicle lift locations indicating the presence of petroleum contamination.

3.2 Chemicals in Groundwater

Concentrations of VOCs and/or SVOCs are present in groundwater near the existing heating oil UST (911 Blaine Street), former UST basin and the hydraulic lift stations (919 Blaine Street). A groundwater benzene concentration reported near the former UST basin was the only reported VOC exceeding the Idaho REM IDTLs.

3.3 Asbestos and Lead-Based Paint in Building Materials

Asbestos

Based on laboratory analysis of the bulk samples, asbestos is present at multiple locations in the former Lodge Brothers building and the former Bullet Pawn Shop building. The ACMs encountered in the survey are currently non-friable, are in fair to good condition and should not pose a health hazard if left undisturbed. However, since the buildings are poised for demolition, the ACMs are to be removed.

Lead-Based Paint

Based on laboratory analysis of the collected paint samples, lead concentrations exceeding 5,000 mg/kg was present in three samples in the former Lodge Brothers building. The volume of the painted material is minimal, however

samples will be collected and analyzed according to the Toxicity Characteristic Leaching Procedure (TCLP) toxicity characteristic hazardous waste constituents, prior to disposal of the material.

4.0 REMEDIAL ACTION PLAN RECOMMENDATIONS

The overall goals of the remedial action plan is to ensure contamination does not threaten public health and the environment during and after redevelopment of the site and to get the site into productive use as quickly as possible. DL Evans Bank is proposing to commercially develop the site by constructing a new bank branch facility.

Based on the extent and magnitude of Petroleum Contaminated Soil (PCS) remaining in the subsurface at 919 Blaine Street, the recommended remedial action presented in the VRWP is the excavation and off-site disposal of subsurface soils in the former UST basin and hydraulic lift station locations. Based on the DL Evans Bank Building Plat Plan (Figure 5), the proposed building footprint is located north of the former UST basin and adjacent to the hydraulic lift locations. All PCS excavated from the site will be disposed off-site at L & R Landfarms, a certified PCS disposal facility. Excavating the PCS and disposing of all contaminated soils at a certified off-site disposal facility may effectively eliminate soil and groundwater exposure pathways. The excavation activities presented in this VRWP will use Idaho's REM values as target cleanup levels to direct the proposed excavation and removal of PCS to be protective of groundwater.

Groundwater adjacent to the former UST basin contains benzene exceeding the Idaho REM IDTL. Therefore, monitoring wells will be installed and groundwater will be monitored for four consecutive quarters or as long as necessary in order to effectively demonstrate to IDEQ that site groundwater concentrations considered to be protective of human health have been achieved.

The Idaho REM guidance document and associated model software will be used to establish on/off-site soil and groundwater clean up criteria. The complete or potentially critical pathways and routes of exposure, include protection of groundwater, surface water and indoor inhalation of soil and groundwater vapors by on-site non-residential receptors. Concentrations of soil and groundwater protective of down-gradient groundwater and surface water will be evaluated through the Idaho REM model to establish clean up criteria. Based on nearby projects, localized groundwater reportedly flows toward the north-northwest (approximately parallel to Indian Creek). The point of exposure for groundwater protection is assumed to be the northwest site boundary and Indian Creek for surface water. The representative soil and groundwater data will be used to estimate site risks and the cleanup criteria for the various pathways and routes of exposure considered. The Idaho REM modeled concentrations will represent the overall site cleanup criteria.

4.1 Quality Assurance Project and Health and Safety Plans

A Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP) will be prepared prior to performing field activities. Quality control samples will be utilized to evaluate field and laboratory variability.

4.2 Hydraulic Lift Stations, Heating Oil UST, and Oil/Water Separator Liquids Removal

Liquids containerized in the hydraulic lifts and the oil/water separator located at 919 Blaine Street and the heating oil UST located at 911 Blaine Street will be pumped into a tanker truck, designed and permitted to transport petroleum hydrocarbons containing liquids to a off-site certified disposal facility.

4.3 Heating Oil UST and Oil/Water Separator Excavation and Removal

Prior to remedial/excavation activities, Digline of Idaho will be contacted to locate and mark underground public utilities.

The approximate 500-gallon heating oil UST will be decommissioned, excavated and removed from the subsurface. Sludge (if any) will be removed from the UST in preparation for transportation off-site to a disposal/recycle facility. The oil/water separator will also be excavated and removed from the subsurface and assessed for possible subsurface contamination.

Following removal activities, one confirmation grab soil sample will be collected according to EPA Method 5035 from the bottom of each excavation and submitted for laboratory analysis for VOCs according to EPA Method 8260B and SVOCs according to EPA Method 8270.

Following soil sample collection, imported pit-run backfill material will be placed in the excavation in lifts and mechanically compacted to sufficient compaction levels (90%) within a defined moisture content range.

4.4 Excavation and Disposal of Petroleum Contaminated Soil

Soil containing petroleum compounds exceeding Idaho's REM cleanup values shall be excavated and temporarily stockpiled on 12-mil plastic sheeting with earthen berms in an on-site PCS soil containment area prior to off-site disposal. An estimated 200 cubic yards of PCS will be excavated near the two hydraulic vehicle hoist lift locations and an estimated 450 cubic yards of PCS will be excavated from the former UST basin. The excavated soil will be monitored to detect petroleum contamination using a field photo-ionization detector (PID), olfactory, analytical testing and visual observations. Stockpiled PCS will be sampled and laboratory analyzed in order to characterize the material for disposal purposes prior to transportation to L & R Landfarms for final disposal/treatment.

Soil excavation activities will be performed in accordance with the following procedures:

- The cleanup criteria involve the removal of site soil from the former UST basin to be protective of groundwater, according to the Idaho REM (July 2004). Following soil removal activities in the former UST basin, confirmation soil samples will be collected from the sidewalls and bottom of the excavation and laboratory analyzed for VOCs according to EPA Method 8260B.
- Currently, IDEQ does not base soil cleanup criteria on TPH concentrations (reported adjacent to the two hydraulic vehicle hoist lifts), however petroleum contaminated source soil does exist near the vehicle lifts and excavation will be based upon olfactory and visual observations. Following soil removal activities near the vehicle lifts, confirmation soil samples will be collected from the sidewalls and bottom of the excavation and laboratory analyzed for TPH and SVOCs according to EPA Methods 8015 and 8270, respectively.
- Means of egress for both personnel and equipment will be provided in accordance with standard construction practices. Excavation side slopes will not exceed 1.5H:1V (1.5 feet horizontal to 1 foot vertical) or properly shored for stability.
- The properties will be accessed from South 10th Avenue, Blaine Street and the alley. Temporary fencing will be placed around the perimeter of the excavation area. Prior to initiation of construction activities, some of the site fencing may be taken down to facilitate remediation activities.
- At appropriate intervals additional equipment will be brought to the site and may include portable toilet(s), generator(s) for security lighting and cargo container(s) for temporary storage of: drums, plastic, stakes, supplies, expendables, etc.
- Conventional construction equipment such as backhoes, excavators and trucks will be used for contaminated soil excavation. Excavation equipment will not require decontamination until completion of the project, as long as the equipment remains within the fenced project area. Equipment will be decontaminated in a lined containment cell prior to removal from the fenced project area. Steam cleaning or soap and water wash, as appropriate, will be used to decontaminate equipment. The equipment decontamination area will have an on-site bermed and lined containment impoundment to prevent additional contamination, and the resulting water will be collected in a frac tank or 55-gallon drums for temporary storage of liquids. The liquids will be sampled and laboratory analyzed for VOCs and SVOCs according to EPA Methods 8260B and 8270, respectively. If necessary, the liquid will be transported to an off-site certified disposal facility.

- Project area controls will include the establishment of specific work zones: Exclusion Zone, Contamination Reduction Zone, and a Support Zone. An Exclusion Zone will be established around the immediate vicinity of each remediation work area. Only qualified personnel and designated equipment to be used in the removal action will be permitted to enter the exclusion zone. The Contamination Reduction Zone will be immediately adjacent to the Exclusion Zone. Personnel and equipment passing through this zone will follow specific decontamination procedures to avoid spreading contaminants outside the immediate remediation area. The Support Zone will consist of the area outside of the Exclusion and Contamination Reduction Zones. In this case it is the remainder of the fenced area of the site.
- Water spray will be used if necessary for dust suppression during excavation and loading activities. Low volume water spray will be applied to material surfaces using equipment appropriate for the task.
- The average depth of the excavation is anticipated to be 10 to 12 feet below ground surface (bgs). Shallower PCS encountered during excavation activities will be removed and added to the PCS soil stockpile for off-site disposal.
- A field PID instrument will be utilized during remediation excavation as a field method to indicate the limits of the petroleum contaminated soil. Soil excavation activities will continue until the field PID and laboratory confirmation samples indicate achievement of soil cleanup levels.
- Excavated soil may be placed directly into transport vehicles, or loading may occur from temporary PCS stockpiles generated near the excavation.
- Clean soil will be stockpiled separately and used for backfill material, following soil excavation activities.
- Contaminated soil will be identified through field PID and laboratory analytical results. PCS will be stockpiled in a soil containment area on 12-mil plastic sheeting with earthen berms sufficient to prevent off-site migration of the stockpiled soil. Stockpiles will be covered overnight to minimize wind-blown dust or exposure to precipitation.
- All PCS excavated from 919 Blaine Street will be transported and disposed at a certified PCS disposal/treatment facility.
- Conventional highway approved transport vehicles will be used, including standard dump trucks, pony trailers, and roll-off containers. All PCS loads will be covered during transportation to the disposal facility.

- Excavation activities will be performed according to the HASP. Technical Standard Operating Procedures and QAPP control procedures will be utilized for field activity oversight and laboratory review.
- The excavation will remain open and secured until confirmation sample results have been received and evaluated and approval has been obtained from IDEQ stating that the selected cleanup criteria have been achieved. To minimize delays, confirmation samples will be analyzed on a 24-hour turnaround basis. Caution signs and orange fencing will be placed at the perimeter of the excavation for public safety. The excavated area will then be backfilled with fill material and the area returned to its original grade. Backfill will be placed in lifts and compacted to sufficient compaction levels (90%) within a defined moisture content range.
- A map illustrating confirmation soil sample locations and limits of the final PCS excavation activities will be produced.

4.5 PCS Stockpile Characterization and Management Plan

Stockpiled PCS will be sampled (prior to removal from the site) in a manner consistent with the QAPP. Composite grab samples will be collected at a minimum of one foot into the stockpile and in areas considered to be the most highly contaminated portions of the stockpile. The composite sample depth will be representative of the actual depth of the stockpiled soil. Soil stockpile samples will be analyzed for TCLP toxicity characteristic hazardous waste constituents (8 RCRA metals) and total petroleum hydrocarbons (TPHs), as required by the PCS disposal facility.

Investigative Derived Waste (IDW) generated during monitoring well installation will consist of soil cuttings and development/purge water from installation and monitoring of the wells. IDW will be temporarily containerized in 55-gallon drums.

PCS and IDW will be handled in a manner consistent with this management plan. Within 14 days of receiving analytical results, the management plan will be implemented in accordance with all relevant local, state, and federal regulations. It is assumed the PCS will be classified as nonhazardous and can be disposed of at an Idaho permitted disposal/treatment facility. If analytical results differ from assumptions made with respect to the initial management plan, MSE will revise the management plan and submit the new plan to IDEQ for review. MSE will implement the new management plan as soon as it is approved by IDEQ.

4.6 PCS Transport and Disposal

A Generator's Non-Hazardous Waste profile form will be completed to facilitate transport and disposal of the PCS from the site to L & R Landfarms. DL Evans Bank will be listed as the Generator of the PCS.

Conventional highway approved equipment shall be used and contaminated loads shall be covered during transport to the disposal facility.

The likely transportation route from the site will be via South 10th Avenue to Interstate 84 to minimize traffic issues.

If hazardous material is encountered during soil removal activities, MSE will characterize the waste material; prepare a Waste Characterization Data Sheet and a Uniform Hazardous Waste Manifest for off-site disposal of the contaminated soil. The laboratory data, Waste Characterization Data Sheet and the Uniform Hazardous Waste Manifest will be submitted to American Ecology (AE) of Grand View, Idaho, IDEQ and DL Evans Bank for review.

Once all approvals have been received, MSE will schedule the transportation and disposal of the hazardous waste material from the site. The transportation schedule will be confirmed with DL Evans Bank, the transporter, and AE. Before transporting the waste, labels and markings on the truck will be compared to the shipping document for accuracy. The truck will be marked with the disposal facility profile identification number. Following inspection, the on-site DL EVANS BANK representative will sign the shipping documents, and the waste will be released for transport to AE.

4.7 Confirmation Soil Sampling

Following PCS excavation activities, confirmation soil samples will be collected from the sidewalls and floor to demonstrate to IDEQ that soil cleanup levels have been attained using certified laboratory analytical methods incorporating multi-incremental sampling techniques. Post-excavation confirmation soil samples will be collected from each wall of the excavation area at 25-foot spacing interval. QAPP samples will be collected including duplicate samples and MS/MSD samples. Floor confirmation soil samples will be collected in a grid fashion located approximately 25 feet apart. Confirmation soil samples will be collected according to EPA Method 5035 and analyzed according to EPA Methods 8260B and/or 8270. TPH concentrations are not used for REM comparison screening values, however will be used to assess hydraulic lift station soil excavation activities.

Sample collection shall be governed by safe work practices and State and Federal OSHA regulations for trenching activities. No sampling will be conducted (by personnel) from within excavations deeper than 4 feet bgs. Sample collection within the excavation (deeper than 4 feet bgs) will be facilitated by using a rubber tire or track mounted excavator.

After collection, an aliquot of soil shall be immediately placed into an appropriate sample container. The location relative to established reference points and the depth interval for each sample shall be recorded.

Samples will be collected in containers of appropriate volume and type appropriate to the analytical method. After filling, the containers will be immediately sealed, labeled and placed in a cooler maintained at 4° C. Samples will be transported/shipped to the laboratory for analysis with chain of custody documentation in sufficient time to perform the requested analysis within the applicable holding times.

4.8 Backfilling of Excavation

The excavation areas will be backfilled using native clean soil stockpiled separately from the PCS during excavation activities. Additional clean backfill material will be acquired from local sources as needed to return the excavation to the original pre-existing ground level.

4.9 Asbestos Abatement

Since the buildings are poised for demolition, the ACMs are to be removed according to OSHA regulation 29 CFR 1926.1101, which requires the ACMs be removed by a qualified and certified asbestos abatement contractor prior to any demolition activities.

The abatement contractor will isolate the portion of the building where the asbestos removal is taking place with sheets of plastic, and provide self-contained showers and throwaway protective suits to prevent contamination of the workers. All ACMs need to be bagged in plastic, and proper disposal must be arranged. It is against the law to dump asbestos-containing materials in general dumps or landfills.

The abatement contractor will be responsible for hiring a firm completely independent of the abatement contractor to performing the air monitoring throughout the project. This independent firm will set up an air monitoring station to ensure that the concentrations of asbestos fibers outside the work area do not increase appreciably during the project.

The abatement contractor must manage the ACMs in accordance with Occupational Safety and Health Administration (OSHA), U.S. Environmental Protection Agency (EPA), Department of Transportation (DOT), and any state or local regulations that are applicable to asbestos abatement projects. Materials containing greater than 1% asbestos are regulated by the EPA. The EPA, through its National Emission Standards for Hazardous Air Pollutants (NESHAPs) rule, has jurisdiction with respect to releases of asbestos to the environment. Additionally, DOT and EPA are concerned with the transportation and disposal of ACM waste. OSHA regulates asbestos removal projects as they relate to worker safety and exposure issues.

Notification of the presence of ACMs to the subcontractors and building owners is required by OSHA regulations. This can be a formal letter or verbal

communication and is fully explained within the OSHA regulation 29 CFR 1910.1001(j).

The EPA enforced NESHAP regulations require a ten-business day notice of demolition be submitted to the EPA Regional Office in Boise, Idaho prior to abatement of the non-friable ACMs.

Completion of the asbestos abatement project is based on successfully fulfilling the criteria of a Final Visual Inspection. Air clearance sampling will not be conducted since the buildings will not be reoccupied and demolished immediately following abatement activities. The individual performing the Final Visual Inspection shall:

- Be accredited by the IDEQ as an asbestos project worker or asbestos project contractor/supervisor.
- Not be contractually associated with the asbestos project contractor conducting the asbestos project.
- Wear appropriate protective clothing and appropriate respiratory protection when entering and occupying the work area.
- Verify that the associated HEPA filter-equipped ventilation fans within the work area are in operation, the work area surfaces are dry, and only critical barriers, airlocks, and a decontamination unit are in place.
- Visually observe the entire work area and decontamination unit to verify that the asbestos project contractor has removed all ACM, dust, and debris from the work area and decontamination unit.
- Require re-cleaning by the asbestos project contractor and subsequent visual inspections until the parties are satisfied no visible ACM, dust, or debris exists in the work area or decontamination unit.
- Complete a written affidavit, which is to be signed by the person(s) conducting the Final Visual Inspection and the asbestos project contractor/supervisor, attesting to the fact that the work area and decontamination unit are free of ACMs, dust, and debris.

4.10 Lead-Base Paint Abatement

All work with a material containing detectable lead concentrations must be treated as having a potential to exceed OSHA's Lead Permissible Exposure Limit (PEL) for total lead of 50 micrograms per cubic meter of air (50 ug/m³). Therefore, any demolition or renovation work that will disturb lead-based paint will be subject to the Lead Construction Standard and should only be handled by a licensed and qualified contractor. According to OSHA's Lead Standard, an

employer is required to assure that no employee is exposed to lead at concentrations greater than the PEL of 50 ug/m^3 for an 8-hour time-weighted average. The Lead Construction Standard also lists an Action Level of 30 ug/m^3 for an 8-hour time-weighted average.

Completion of the lead-based paint abatement project is based on successfully conducting a room-by-room visual examination, since the buildings will not be reoccupied and demolished immediately following abatement activities. A visual examination determines whether abatement of potentially hazardous lead-based painted building materials was completed and ensures that no visible settled dust or debris are present.

5.0 POST EXCAVATION WELL INSTALLATION AND GROUNDWATER MONITORING

Following PCS excavation activities, a proposal for post-excavation groundwater monitoring well installation and groundwater sampling and analysis plan (SAP) will be submitted to IDEQ for approval prior to installation. Following approval by IDEQ, a sufficient number of groundwater monitoring wells (approximately three) will be installed to confirm groundwater petroleum hydrocarbon concentrations are below acceptable concentrations to be protective of groundwater, human health and the environment.

Monitoring well installation involves drilling soil borings to approximately 15 feet bgs. Each soil boring will be completed using 2-inch diameter polyvinyl chloride (PVC), Schedule 40, flush-joint screen and casing with lockable caps.

The screen will be factory slot size of 0.010 inch and the well annulus will be completed with silica environmental sand (10-20) from the bottom of the wells to approximately six inches above the casing screen. Bentonite and grout seal from the top of the silica sand to approximately 10 inches bgs. Flush-mount, traffic rated steel well monuments will be installed to protect each wellhead location. Well covers will be marked with "Monitoring Well" in permanent raised or engraved lettering

Following installation, each monitored well will be developed in preparation for ground water sampling. Development water will be collected and containerized in 55-gallon drums for off-site transport and disposal.

Groundwater will be monitoring for four consecutive quarters or as long as necessary in order to effectively demonstrate to IDEQ that groundwater cleanup criteria have been achieved.

Groundwater samples will be analyzed for VOCs and SVOCs according to EPA Methods 8260B and 8270, respectively.

6.0 VRWP SCHEDULE

The activities in this VRWP are anticipated to occur in the proposed dates presented below in the proposed implementation timeline:

Proposed Date	Event
	Submittal of Final VRWP to IDEQ
Week 1	Initiation of 30-day comment period for public review process.
Week 2 - 6	Public review period for VRWP.
Week 7	Prepare HASP and QAPP. Submit QAPP to IDEQ for approval.
Week 8	Pump liquids from heating oil UST and hydraulic lift stations for off-site disposal. Excavate and removal heating oil UST from subsurface.
Week 8 - 9	Asbestos and lead-based paint abatement.
Week 10 - 11	Building demolition at 911 and 919 Blaine Street.
Week 12	Excavation, transportation and disposal of PCS. (Temporary stockpiling of PCS may be necessary)
Week 13	Monitoring well installation, well survey and sampling.
Week 14 - 15	Prepare draft completion report for VCP remedial activities and confirmation soil sample analytical results.
Week 16	Submittal of draft completion report for VCP to IDEQ.
Week 17 - 18	IDEQ review of draft completion report.
Week 19 - 20	Incorporate IDEQ comments and prepare final completion report.
Week 20	Submittal of final report to IDEQ.
TBD	Groundwater monitoring and first quarter progress report.
TBD	Groundwater monitoring and second quarter progress report.
TBD	Groundwater monitoring and third quarter progress report.
TBD	Groundwater monitoring and forth quarter progress report.

TBD – Schedule To Be Determined based on completion of remedial activities and submittal of final completion report.

7.0 PROJECT ORGANIZATION

The following key personnel and companies are currently proposed for this project. In addition, the program manager may need to add or delete project organization members based on the needs of the project and related issues.

Owner/Owner's Representative:

DL Evan Bank
Chad Hamilton, Project Representative

Regulatory Oversight and/or Questions:

IDEQ
Eric Traynor

Environmental Manager:

MSE
James Kuchera, Environmental Program Manager
Project personnel: Technicians, scientists, engineers, etc.

Health and Safety:

MSE
Jared Potts, Site Safety Officer

Analytical Laboratory:

Environmental Science Corporation
Project Manager: Rodney Mann

Subcontractors:

AAI – Demolition and Construction Asbestos and Lead-Based Paint Abatement.
Northwest Technology – UST Removal and disposal.

The project manager and associated personnel have advanced health and safety training to include 40-hour Hazardous Waste Site Operations and 8-hour Refresher courses, as specified in OSHA, 29 CFR 1910.120.

8.0 ENVIRONMENTAL COVENANTS

IDEQ allows the use of environmental covenants (if necessary), imposing activity and use limitations, associated with contaminated portions of the site, as part of the remedial strategy. Based on the location of the property, municipal water will be supplied to the site and future use is anticipated to utilize Caldwell City services. It's unlikely that the potentially affected populations on and off-site will use the impacted shallow groundwater at the site for drinking water and therefore

the practical risks of exposure of human receptors to groundwater contamination are low.

However, because the potential does exist for a well to be installed at the property (however probability is low), IDEQ requires some form of remedy to insure that this pathway remains incomplete, eliminating the potential risks to human receptors from drinking the shallow groundwater. Therefore, use of an environmental covenant prohibiting the use of site groundwater for drinking water purposes on the effected property is an institutional control that would be considered an acceptable remedial approach by IDEQ.

If required, an environmental covenant for the site will be prepared and submitted to IDEQ for approval before it is recorded on the individual deeds. Once approved, the environmental covenants will be recorded at the Canyon County Recorder's Office in Caldwell, Idaho. Proof of the recordings will be provided to IDEQ.

9.0 FILING FOR CERTIFICATE OF COMPLETION

Following the completion of soil excavation, PCS disposal, monitoring well installation, groundwater monitoring, asbestos and lead-based paint abatement, a post excavation REM Risk Evaluation RE-1 will be performed for the site using soil and groundwater sample analytical data to estimate the degree of risk to non-residential receptors from complete or partially complete contaminate pathways on the site. The complete or potentially critical pathways and routes of exposure, include protection of groundwater, surface water and indoor inhalation of soil and groundwater vapors by on-site non-residential receptors. Cumulative risk and hazard index values will be calculated in order to determine if health risks exist at the site that may impose adverse impacts to human receptors or potentially degrade the quality of groundwater.

If post excavation risk values and cumulative hazard quotients are determined to be below target risk criteria, a VRWP completion report together with a request for a "Certificate of Completion" for the successful implementation of soil and groundwater remedial activities will be submitted to IDEQ. The completion report shall be supported by documentation indicating the extent of soil excavation activities, the removal of subsurface PCS, disposal of PCS at the proper disposal facility, and QAPP validation of soil and groundwater laboratory analytical results as required by IDEQ.

If any risk values and/or cumulative hazard quotients are determined to exceed target risk criteria following the implementation of the VRWP, a contingency plan for additional remediation will be developed and submitted to IDEQ.

Receipt of a Certificate of Completion from IDEQ shall indicate that DL Evans Bank has successfully implemented all intended actions and fulfilled all requirements for the site as established in the VRWP. Within thirty (30) days of

September 4, 2008

receipt of IDEQ's Certificate of Completion, DL Evans Bank may request that IDEQ negotiate and provide a "covenant not to sue" as provided in Section 39-7207, Idaho Code.

Table 1

Soil Sample Laboratory Analytical Results
EPA Methods 8260 Volatile Organic Compounds & 8270 Semi-Volatile Organic Compounds
Voluntary Remediation Work Plan
911 and 919 Blaine Street
Caldwell, Idaho

Results and IDTLs are reported in micrograms per liter (ug/kg)

Sample Location	Sample ID	Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene	MTBE	1,2-Dichloroethane	Tetra-chloroethylene	Acenaphthene	Acenaphthylene
Probe P1	BP-SS-01 (P1)	June 15, 2007	ND (<15)	ND (<25)	ND (<25)	ND (<25)	ND (<50)	ND (<35)	ND (<12.5)	ND (<25)	ND (<67)	ND (<67)
Probe P2	LB-SS-03 (P2)	June 15, 2007	ND (<15)	ND (<25)	ND (<25)	ND (<25)	ND (<50)	ND (<35)	ND (<12.5)	ND (<25)	ND (<67)	ND (<67)
Probe P3	LB-SS-05 (P3)	June 15, 2007	ND (<15)	ND (<25)	ND (<25)	ND (<25)	ND (<50)	ND (<35)	ND (<12.5)	ND (<25)	ND (<67)	ND (<67)
Probe P4	LB-SS-07 (P4)	June 15, 2007	ND (<15)	ND (<25)	ND (<25)	ND (<25)	ND (<50)	ND (<35)	ND (<12.5)	ND (<25)	ND (<67)	ND (<67)
Probe P5	LB-SS-09 (P5)	June 15, 2007	ND (<15)	39	85	808	716	ND (<35)	ND (<12.5)	ND (<25)	ND (<67)	ND (<67)
Probe P6	LB-SS-11 (P6)	June 15, 2007	ND (<15)	ND (<25)	ND (<25)	46	ND (<50)	ND (<35)	ND (<12.5)	ND (<25)	ND (<67)	ND (<67)
Probe P7	LB-SS-13 (P7)	June 15, 2007	ND (<15)	ND (<25)	ND (<25)	ND (<25)	ND (<50)	ND (<35)	ND (<12.5)	ND (<25)	ND (<67)	ND (<67)
IDEO - REM IDTLs - Soil			18	4,890	10,200	1,670	1,140	36.4	7.67	28.8	52,300	78,000

TABLE 1 CONTINUED

Sample Location	Sample ID	Date	Anthracene	Benz(a)anthracene	Benz(a)pyrene	Benz(a,h)pyrene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	Phenanthrene	Pyrene
Probe P1	BP-SS-01 (P1)	June 15, 2007	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)
Probe P2	LB-SS-03 (P2)	June 15, 2007	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)
Probe P3	LB-SS-05 (P3)	June 15, 2007	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)
Probe P4	LB-SS-07 (P4)	June 15, 2007	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)
Probe P5	LB-SS-09 (P5)	June 15, 2007	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	120	ND (<67)	ND (<67)	ND (<67)
Probe P6	LB-SS-11 (P6)	June 15, 2007	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)
Probe P7	LB-SS-13 (P7)	June 15, 2007	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)	ND (<67)
IDEO - REM IDTLs - Soil			1,040,000	422	42.2	1,180,000	33,400	42.2	364,000	54,800	422	79,000	369,000

Notes:

- [1] BP - Bullet Pawn Shop, 911 Blaine Street (probe P1 - heating oil UST sample)
[2] LB - Lodge Brothers Property, 919 Blaine Street
[3] ND - Not detected above laboratory analytical reporting limits.
[4] IDEQ - Idaho Department of Environmental Quality.
[5] REM - Risk Evaluation Manual.
[6] IDTLs - Initial Default Target Levels.
[7] Bold Font - Concentration exceeds IDEQ REM IDTLs.

Table 2

**Soil Sample Laboratory Analytical Results
EPA Method 8015 D - TPH**

**Voluntary Remediation Work Plan
911 and 919 Blaine Street
Caldwell, Idaho**

Results are reported in microgram per kilogram (ug/kg)

Sample Location	Sample ID	Date	Total Petroleum Hydrocarbons
Probe P1 - Heating Oil UST	BP-SS-01 (P1)	June 15, 2007	<50,000 (DR) and <100,000 (LOR)
Probe P5 - Vehicle Hoist Lift	LB-SS-09 (P5)	June 15, 2007	79,800 (DR) and 3,580,000 (LOR)
Probe P6 - Vehicle Hoist Lift	LB-SS-11 (P6)	June 15, 2007	<50,000 (DR) and 3,180,000 (LOR)
Probe P7 - Vehicle Hoist Lift	LB-SS-13 (P7)	June 15, 2007	<50,000 (DR) and <100,000 (LOR)

Notes:

- [1] DR - Diesel range hydrocarbons
- [2] LOR - Lube oil range hydrocarbons
- [3] BR - Bullet Pawn Shop, 911 Blaine Street
- [4] LB - Lodge Brothers property, 919 Blaine Street

Table 3

Groundwater Sample Laboratory Analytical Results
EPA Methods 8260 Volatile Organic Compounds & 8270 Semi-Volatile Organic Compounds
Voluntary Remediation Work Plan
911 and 919 Blaine Street
Caldwell, Idaho

Results and IDTLs are reported in micrograms per liter (ug/L)

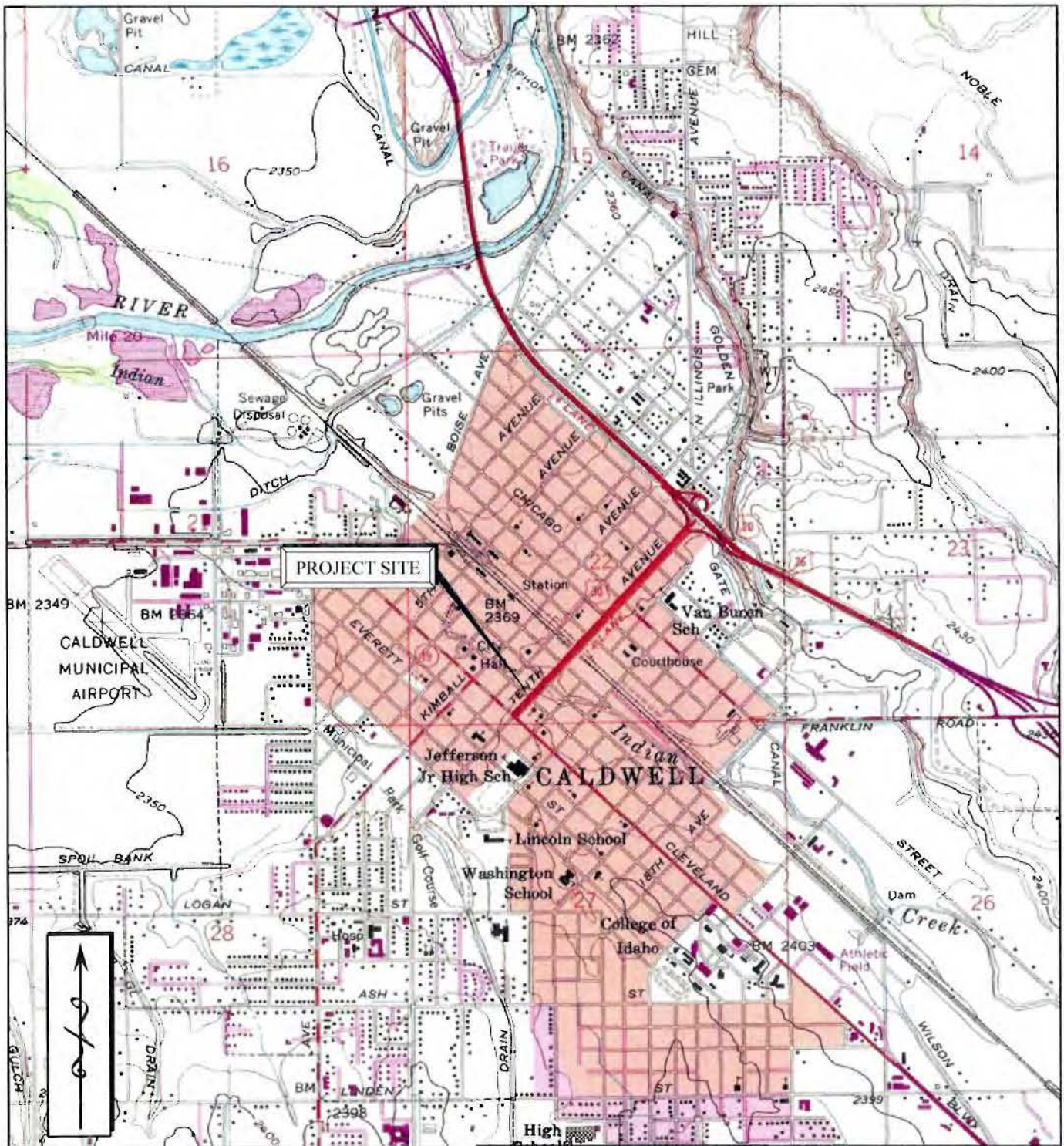
Sample Location	Sample ID	Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene	MTBE	1,2-Dichloroethane	Tetra-chloroethylene	Acenaphthene	Acenaphthylene
Probe P1	BP-W-S-02 (P1)	June 15, 2007	ND (<0.3)	ND (<0.5)	ND (<0.5)	ND (<0.5)	ND (<1)	ND (<0.7)	ND (<2.5)	ND (<0.5)	ND (<0.8)	ND (<0.8)
Probe P2	LB-W-S-04 (P2)	June 15, 2007	ND (<0.3)	ND (<0.5)	ND (<0.5)	ND (<0.5)	ND (<1)	ND (<0.7)	ND (<0.25)	ND (<0.5)	ND (<0.6)	ND (<0.6)
Probe P3	LB-W-S-06 (P3)	June 15, 2007	ND (<0.3)	ND (<0.5)	ND (<0.5)	ND (<0.5)	ND (<1)	ND (<0.7)	ND (<0.25)	ND (<0.5)	ND (<0.6)	ND (<0.6)
Probe P4	LB-W-S-08 (P4)	June 15, 2007	61	ND (<5)	ND (<5)	14.9	18.3	ND (<7)	ND (<0.25)	ND (<5)	ND (<0.7)	ND (<0.7)
Probe P5	LB-W-S-10 (P5)	June 15, 2007	ND (<0.3)	0.9	ND (<0.5)	4.7	2.8	ND (<0.7)	ND (<0.25)	ND (<0.5)	ND (<0.6)	ND (<0.6)
Probe P6	LB-W-S-12 (P6)	June 15, 2007	ND (<0.3)	ND (<0.5)	ND (<0.5)	ND (<0.5)	ND (<1)	ND (<0.7)	ND (<0.25)	ND (<0.5)	ND (<0.6)	ND (<0.6)
Probe P7	LB-W-S-14 (P7)	June 15, 2007	ND (<0.3)	ND (<0.5)	ND (<0.5)	ND (<0.5)	ND (<1)	ND (<0.7)	ND (<0.25)	ND (<0.5)	ND (<0.6)	ND (<0.6)
IDEQ - REM IDTLs - Groundwater			5	1,000	700	4,340	209	16.9	5	5	626	626

TABLE 3 CONTINUED

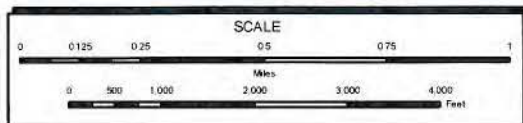
Sample Location	Sample ID	Date	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(g,h,i)perylene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	Phenanthrene	Pyrene
Probe P1	BP-W-S-02 (P1)	June 15, 2007	ND (<0.8)	ND (<0.8)	ND (<0.8)	ND (<0.8)	ND (<0.8)	ND (<0.8)	ND (<0.8)	ND (<0.8)	ND (<0.8)	1.8	ND (<0.8)
Probe P2	LB-W-S-04 (P2)	June 15, 2007	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)
Probe P3	LB-W-S-06 (P3)	June 15, 2007	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)
Probe P4	LB-W-S-08 (P4)	June 15, 2007	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)	ND (<0.7)
Probe P5	LB-W-S-10 (P5)	June 15, 2007	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)
Probe P6	LB-W-S-12 (P6)	June 15, 2007	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)
Probe P7	LB-W-S-14 (P7)	June 15, 2007	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)	ND (<0.6)
IDEQ - REM IDTLs - Groundwater			3,130	0.07	0.2	313	7.6	0.007	417	417	0.007	313	313

Notes:

- [1] BP - Bullet Pawn Shop, 911 Blaine Street (probe P1 - healing oil UST sample)
- [2] LB - Lodge Brothers Property, 919 Blaine Street
- [3] ND - Not detected above laboratory analytical reporting limits.
- [4] IDEQ - Idaho Department of Environmental Quality.
- [5] REM - Risk Evaluation Manual.
- [6] IDTLs - Initial Default Target Levels.
- [7] Bold Font - Concentration exceeds IDEQ REM IDTLs.



REFERENCE: U.S.G.S. 7.5 MINUTE QUADRANGLE,
CALDWELL, IDAHO 1971



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SITE LOCATION MAP

911 BLAINE STREET AND
919 BLAINE STREET
CALDWELL, IDAHO

VRWP

8-11-08

MSE

FIGURE 1

